IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation, Plaintiff, v. PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual, Defendants.	)	C.A. No. 00-2041 Judge William L. Standish

NOTICE OF DEPOSITION DIRECTED TO JACK NAPOR

TO: Jack Napor
c/o Thomas E. Reilly, Esquire
Thomas E. Reilly, P.C.
2025 Greentree Road
Pittsburgh, PA 15220

TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, the oral deposition of **JACK NAPOR** will be taken before a Notary Public or some officer authorized to administer oaths. A Certified Court Reporter will record such deposition. The deposition will be held in the offices of **BURNS, WHITE & HICKTON, LLC, Four Northshore Center, 106 Isabella Street, Pittsburgh, Pennsylvania 15212, on Wednesday, October 12, 2005 commencing at 10:00 a.m.** and will continue from day to day until completed.

EXHIBIT B

The scope and purpose of the Deposition is to inquire into the facts, causes and results of the incident in suit, including the identity and whereabouts of witnesses.

Respectfully submitted,

BURNS, WHITE & HICKTON, LLC

BY: ______________________

John P. Sieminski, Esquire
PA58991
Robert K. Schweitzer, Esquire
PA87649
Attorneys for Defendant, John Herklotz

BURNS, WHITE & HICKTON, LLC
Four Northshore Center
106 Isabella Street
Pittsburgh, Pennsylvania 15212
(412) 995-3000
(412) 995-3300 (Facsimile)

Dated: 9/21/05

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Notice of Deposition of Jack Napor was served on counsel listed below by U.S. First Class Mail, postage prepaid, this 27th day of September, 2005:

Thomas E. Reilly, Esquire
Thomas E. Reilly, P.C.
2025 Greentree Road
Pittsburgh, PA 15220

John W. Gibson, Esquire
1035 Fifth Avenue
Pittsburgh, PA 15219-6201

BURNS, WHITE & HICKTON, LLC

BY: ______________________
John P. Sieminski, Esquire
Robert K. Schweitzer, Esquire

Attorneys for Defendant, John Herklotz